

LAW OFFICES OF KEVIN J. KEATING

KEVIN J. KEATING, ESQ

Stefani Goldin, Esq.
Of Counsel

Laura O'Neil
Paralegal

666 OLD COUNTRY ROAD
SUITE 900
GARDEN CITY, NEW YORK 11530-2004
(516) 222-1099
Fax: (516) 745.0844

kevin@kevinkeatinglaw.com

MANHATTAN OFFICE:
1140 AVENUE OF THE AMERICAS
9TH FLOOR
NEW YORK, N.Y. 10036

November 27, 2018

VIA ECF

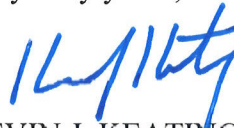
United States Attorney's Office
Eastern District of New York
610 Federal Plaza
Central Islip, NY 11722
Attn: AUSA Catherine Mirabile
AUSA Lara Treinis Gatz
AUSA Christopher Caffarone

Re: *United States v. Edward Mangano, et al.*
Criminal Docket No. 16-540

Counsel:

I enclose an executed Stipulation with regard to draft transcripts to be disclosed to the defense. However, I have deleted "line sheets" from the Stipulation, as I believe I am entitled to these materials without qualification. Please consider this a demand for the production of *all* line sheets from the 30-day Singh wiretap.

Very truly yours,



KEVIN J. KEATING

Enclosure
cc: All Counsel
KJK/cn

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

EDWARD MANGANO and
LINDA MANGANO,

Defendants.

STIPULATION

16-CR-540 (S-2) (JMA)

- - - - - X

The parties hereby STIPULATE AND AGREE as follows:

1. Draft transcripts, ^{K.K.} ~~including line sheets~~, provided to the defendants by the United States, or copies, redacted copies, or any portions thereof ("Draft Transcripts") shall not be used in any proceeding by any person, including persons who are not parties to this case;
2. The use of any Draft Transcripts by the defendants is limited to trial preparation for this case and the Draft Transcripts may not be used at trial by the defendants in any form or for any purpose whatsoever, including use in cross-examination of any witnesses;
3. Draft Transcripts may not be furnished, directly or indirectly, by the defendants or defense counsel to anyone who has not signed this stipulation, other than legal staff of an attorney who has signed this stipulation if such persons agree not to furnish the Draft Transcripts to others;

4. All Draft Transcripts, including all copies of such transcripts, whether in the possession of defense counsel or the defendants, will be returned to the United States when final transcripts are provided by the United States.


Dated: November 20, 2018
Central Islip, New York

RICHARD P. DONOGHUE
United States Attorney
Eastern District of New York
610 Federal Plaza
Central Islip, New York 11722

By: _____

Catherine M. Mirabile
Lara Treinis Gatz
Christopher C. Caffarone
Assistant United States Attorneys
(631) 715-7850/7913/7868

AGREED AND STIPULATED TO:



Kevin Keating, Esq.
Attorney for Edward Mangano

John Carman, Esq.
Attorney for Defendant Linda Mangano